



## **Language Access Plan**

### **Introduction**

The Columbus Metropolitan Housing Authority (CMHA) recognizes that language can be a barrier for Franklin County residents in accessing our programs. In developing this Plan, CMHA reviewed U. S. Census Bureau 2014 Population Estimates data for our service area along with the tenant characteristics we collect. In making the final decision on the plan, we depended a lot on our day to day experience and requests received from community organizations and individuals.

This Plan addresses those individuals who need services or information from us in a language other than English. These individuals are defined as persons with Limited English Proficiency (LEP). They are persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. CMHA has taken and will continue to take affirmation action to communicate with LEP customers, recognizing their individual desires for assistance first.

The guiding principles used for this analysis and plan of action are 1) the number or proportion of LEP persons eligible to be served or likely to be encountered by CMHA; 2) the frequency with which LEP persons come in contact with CMHA staff/programs; 3) the nature and importance of the program, activity, or service provided by CMHA to the lives or our customers; and 4) the resources available to CMHA and the costs.

### **Identifying LEP candidates**

The goal of the Columbus Metropolitan Housing Authority's Language Access Plan is to ensure that all individuals, potential applicants, applicants, and participants, regardless of the primary language spoken, have meaningful access to housing services. CMHA uses HUD's Four Point Analysis tool to identify the LEP population and the language services that are needed to meet its LAP objective.



## Language Access Plan

### Franklin County Characteristics

*U. S. Census 2014 Population Estimates* for Franklin County show a Hispanic or Latino population of 5.1% while the non-Hispanic/Latino population represented 96%. Further the *2009 – 2013 American Community Survey 3-Year Estimates* declares that eight percent of the people living in Franklin County were foreign born. Among those that were at least five years old living in Franklin County, 12 percent spoke a language other than English at home. Of those speaking a language other than English at home, 32 percent spoke Spanish and 68 percent spoke some other language; 41 percent reported that they did not speak English “very well. “Both the Public Housing (PH) and the Housing Choice Voucher (HCV) programs have approximately a 1 percent Hispanic or Latino population represented in the current client counts as of December 2014. However, Hispanic or Latino households represent 2.1% and 1.2% of the PH and HCV Wait Lists respectively. It is evident that the Hispanic or Latino population represented on the Wait Lists is growing but not approximating the current local U. S. Census estimates.

CMHA does not maintain statistics on ethnicities other than Hispanic or Latino or those required by Housing and Urban Development to be collected. However, we have interpretation request data that confirms our staff’s daily experience in both PH and HCV. Franklin County has a strong Somali population that participates in both of our housing programs as active tenants and applicants. Because of the daily requests, CMHA has provided interpretation services upon customer or staff request for over two years now. Of the 439 request for interpretation services in 2014, 79% has been for Somali. The remaining requests were a mixture of 11 other languages including American Sign Language.

### **Factor One: The Number or Proportion of Limited English Proficient (LEP) Individuals to be Served or Likely to be Encountered**

Given the Franklin County percentage of Hispanics/Latinos CMHA will translate vital documents and for clients that speak Spanish to more affirmatively serve that population for both Public Housing and HCV.

With the current requests and day to day experience of CMHA staff, CMHA in its LEP analysis has determined that it will translate vital documents for clients or applicants that speak Somali in both Public Housing and the Housing Choice Voucher programs.

Vital documents include the following: Applications, Public Housing lease, Part C of the HAP Contract (Tenancy Addendum), Ineligible letter, Notice of Proposed Action, Notice of Proposed Termination of the Lease, Personal Declaration, Request for Tenancy



## Language Access Plan

Approval, Waitlist Accepted letter, Waitlist Denial letter, VAWA notices, denial letters, proposed termination letters, notices to make repairs, notices outlining tenant's rights under VAWA, notices advising LEP persons of free language assistance, notices of eviction, notices of rights, denial, loss, or decreases in benefits or services, intake forms and other correspondence with the potential for important consequences.

### **Factor Two: The Frequency with which LEP Individuals Come in to Contact with the Staff/Program**

The minimum frequency of contact for the 13,000 HCV and 1,372 PH subsidy households includes initial applications, lease signing, voucher briefing, annual re-exams, up to biennial inspections and interim re-exams as reported by the tenant households. In addition, some families may receive emergency inspections for health, safety or life threatening conditions in their housing unit that occur prior to the annual re-exam. There are HUD inspections, as well as informal and formal hearings requested by the tenant. Minimally, each household will potentially have two contacts initiated by the housing authority on a yearly basis.

### **Factor Three: The Nature and Importance of the Program, Activity or Service Provided by the Program**

Part of CMHA's mission is to "serve the community by helping people access affordable housing" in Franklin County. To do this, community residents need to be able to access our programs through applications and oral discourse they can understand. Applications and the eligibility process are compulsory and as such the basic documents need to be translated into the language most requested by CMHA tenants. Program compliance is also very important to ensure that a client can maintain their housing subsidy. Documents that relate to tenancy requirements (i.e. a lease) or communicate actions required on behalf of the tenant to maintain their housing assistance will be translated in Spanish and Somali. Translation services will be made available to facilitate oral interactions between CMHA and its clients.

### **Factor Four: Resources Available to the Recipient and Costs**

The CMHA has the following resources available, to ensure that LEP individuals have meaningful access to both the PH and HCV programs:

- Professional interpretation services for scheduled appointments or meetings.
- Professional interpretation services for expedited interpretation service facilitated by a 3-way phone call.



**COLUMBUS METROPOLITAN HOUSING AUTHORITY**

COMMUNITY. COMMITMENT. COLLABORATION.

### **Language Access Plan**

- Bi-lingual (Spanish and Somali) recordings for the telephone system's auto attendant.



## **Language Access Plan**

- Vital PH and HCV program documents have been translated in Somali and Spanish and shall be provided to LEP clients. Documents include applications, Public Housing lease, Part C of the HAP Contract (Tenancy Addendum), Ineligible letter, Notice of Proposed Action, Notice of Proposed Termination of the Lease, Personal Declaration, Request for Tenancy Approval, Waitlist Accepted letter, Waitlist Denial letter and VAWA notices. In addition, CMHA shall provide to LEP clients, both English and translated versions of denial letters, proposed termination letters, notices to make repairs, notices outlining tenant's rights under VAWA, notices advising LEP persons of free language assistance, notices of eviction, notices of rights, denial, loss, or decreases in benefits or services, intake forms and other correspondence with the potential for important consequences.
- In all CMHA lobby areas, a poster is displayed notifying customers that free language assistance is available to families upon request. The poster lists the languages that CMHA, through its interpreting service, is able to provide.
- Bilingual Pay incentive for Staff
- "I speak" cards will be utilized to encourage LEP individuals to self-identify.
- Professional translators may also be contracted, when needed, to ensure that accurate and clearly understandable information is disseminated to the public.
- When CMHA opens or closes a waiting list, we will advertise through public notice in local newspapers, minority and ethnic publications, media entities and its website, advising the public about location(s), and program(s) for which applications are being accepted or stopped.
- The offer of an interpreter and the recipient's choice will be documented by staff in the computer note screen of the LEP individual.
- CMHA will continue to put tag lines on CMHA's envelopes sent to clients which advise in English, Spanish and Somali, the number to call for translation assistance.
- CMHA will display and maintain a fair housing poster in Spanish and Somali at all locations where dwelling units are offered for sale or rental.

### **Staff Training:**

CMHA will provide annual training to both the Public Housing and Housing Choice Voucher staff on the LAP and Limited English Proficiency, including its definition, sensitivity to LEP families, effectively serving LEP families, what the regulations require with regard to LEP and what CMHA policies and procedures require. New employees who directly serve our clients will be provided LAP and LEP training within 90 days of their hire date.



## **Language Access Plan**

### **Access to LEP Services:**

The CMHA LAP Plan will be made available to the public on CMHA's website or by request as a reasonable accommodation. The Plan is in English with interpretation of the document upon request.

If during the course of an interview or other in person contact, the client demonstrates limited understanding or ability to communicate responses to questions or comments made, the CMHA employee will immediately ask if interpretive services are needed. If such services are needed or requested, the Client Service Supervisor will be contacted and arrangements made to set up a follow up interview with an interpreter present. The follow up appointment should be set for as soon as reasonably possible and mutually agreeable to the worker and the client.

Appointments rescheduled as a result of the need for interpreter services will not be considered a missed appointment for possible lease termination.

Staff requests for interpreting and translating services will be arranged by and through Client Services Supervisor and or the respective unit supervisor's.

If a client engagement requires immediate interpretation services, CMHA staff will coordinate a three-way call with its interpretation service provider and the client. The interpretation service provider will help CMHA determine the appropriate subsequent action to take in order to serve the client adequately.

### **Monitoring and Updating the LEP Plan:**

Monitoring and implementation of the plan will be the shared responsibility of the Vice President, Assistant Vice President and Supervisors in each service area. The LAP Plan will be reviewed and updated as needed by the Senior Vice President of Housing Programs.

Complaints regarding the LEP services will be forwarded to the Senior Vice President of Housing Programs for investigation and follow up.

### **Implementation Timelines**

The LEP services outlined in this document have been implemented. The LAP document will be posted on CMHA's website in the "Documents Library" page once it has been reviewed and approved by HUD.